

SAPONE & PETRILLO, LLP

William S. Petrillo, Esq., Partner
Edward V. Sapone, Esq., Partner

Chase S. Ruddy, Esq., Senior Associate

MANHATTAN

1 Penn Plaza, Suite 5315
New York, New York 10119
Telephone: (212) 349-9000
Facsimile: (212) 349-9003
E-mail: ed@saponepetrillo.com

LONG ISLAND

1103 Stewart Avenue, Suite 200
Garden City, New York 11530
Telephone: (516) 678-2800
Facsimile: (516) 977-1977
E-mail: william@saponepetrillo.com

BY ECF

May 24, 2019

Honorable Richard M. Berman
United States District Court Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Vaughn Richmond*
Docket No.: 13-CR-356

Dear Judge Berman:

I am retained counsel to Vaughn Richmond in the above-referenced case. Mr. Richmond is scheduled to appear before Your Honor on Tuesday, May 28, 2019, for an update on his compliance with the conditions of his supervised release.

I submit this letter jointly with the government to respectfully request that the Court adjourn the currently scheduled conference, and schedule a status conference in approximately 60 days.

On January 14, 2019, the Court held a status conference, at which the Court granted the Government's motion to dismiss pending specifications of violations of supervised release filed against Mr. Richmond. At the time of that conference, Mr. Richmond owed restitution payments in the amount of \$1,400 for the months of December 2018 and January 2019. On February 13, 2019, he made a restitution payment of \$2,100, covering the months of December 2018, January 2019, and February 2019. Given Mr. Richmond's compliance with his restitution obligations, the government moved to adjourn the then scheduled February 26, 2019 conference so that the parties could continue to monitor Mr. Richmond's compliance with his restitution obligations and the other conditions of his supervision.

The Court scheduled another conference for May 21, 2019. Your Honor was kind enough to delay that conference a week due to my wife's surgery, and to allow time for us to confirm Mr. Richmond's continued compliance with his restitution obligation.

I apologize for writing to the Court late on a Friday before the holiday weekend, but I just received confirmation that Mr. Richmond's restitution payments are up to date, and he remains in compliance.

Given Mr. Richmond's continued compliance, I conferred the case with the government, by AUSA Brett Kalikow, and they join me in this request for a 60-day adjournment of the status conference to continue to monitor Mr. Richmond's compliance.

The Court's consideration is greatly appreciated.

Respectfully submitted,

/s/ Edward V. Sapone
Edward V. Sapone

cc: A.U.S.A. Samson Enzer
A.U.S.A. Brett Kalikow
P.O. Ana Gonzalez